

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow,

:

Plaintiff,

:

v.

:

Civil Action No: 3:11-cv-00020-MHL
(Consolidated)

Friedman & MacFadyen, P.A. and
Johnie R. Muncy,

:

:

Defendants.

**MEMORANDUM IN SUPPORT OF
JOINT MOTION TO EXTEND STAY**

As set out in the parties' Joint Motion to Extend Stay, the parties are diligently pursuing attempts to mediate these matters. While those efforts have been underway for some time, and were delayed by circumstances beyond the control of the parties, the efforts have now resulted in initial productions of data and a scheduled mediation date. The parties have worked collaboratively in this regard and are hopeful that the scheduled mediation may resolve these matters.

An extension of stay in these matters will not prejudice any party and, to the extent it is calculated to try to resolve a number of filed and unfiled matters in this District and elsewhere, furthers interests of judicial economy and the administration of justice.

For these reasons and those set out in the parties Motion for Extension of Stay, the parties jointly request that the stay previously entered in this matter be extended until June 15, 2012.

DATED: March 21, 2012

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.
JOHNIE MUNCY**

By Counsel

/s/

Douglas P. Rucker, Jr. (VSB # 12776)

Andrew Biondi (VSB # 48100)

Cullen D. Seltzer (VSB #35923)

SANDS ANDERSON PC

2300 Bank of America Center

1111 East Main Street (23219)

P. O. Box 1998

Richmond, VA 23218-1998

(804) 648-1636

(804) 783-7291 (facsimile)

Email: drucker@sandsanderson.com

Email: abiondi@sandsanderson.com

Email: cseltzer@sandsanderson.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Dale W. Pittman, Esq.
The Law Office of Dale W. Pittman, P.C.
112-A W. Tabb Street
Petersburg, Virginia 23803
Telephone: 804-861-6000
Facsimile: 804-861-3368
dale@pittmanlawoffice.com
Counsel for Plaintiff

John C. Petersen, Esq.
Surovell Isaacs Petersen & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-251-5400
Facsimile: 703-591-9285
jpetersen@smillaw.com
Counsel for Plaintiff

Kristi Cahoon Kelly, Esq.
Surovell Isaacs Peterson & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-277-9774
Facsimile: 703-591-2149
kkelly@smillaw.com
Counsel for Plaintiff

Leonard Anthony Bennett, Esq.
Consumer Litigation Associates, P.C.
12515 Warwick Boulevard
Suite 100
Newport News, Virginia 23606
Telephone: 757-930-3660
Facsimile: 757-930-3662
lenbennett@cox.net
Counsel for Plaintiff

Matthew J. Erausquin, Esq.
Consumer Litigation Associates, P.C.
1800 Diagonal Road
Suite 600
Alexandria, Virginia 22314
Telephone: 703-273-6080
Facsimile: 888-892-3512
matt@clalegal.com
Counsel for Plaintiff

Richard J. Rubin, Esq.
1300 Canyon Road
Santa Fe, New Mexico 87501
Telephone: 505-983-4418
Facsimile: 505-983-2050
dickrubin@cs.com
Counsel for Plaintiff

/s/

Douglas P. Rucker, Jr. (VSB # 12776)
Andrew Biondi (VSB # 48100)
Cullen D. Seltzer (VSB # 35923)
SANDS ANDERSON PC
2300 Bank of America Center
1111 East Main Street (23219)
P. O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636
(804) 783-7291 (facsimile)
Email: drucker@sandsanderson.com
Email: abiondi@sandsanderson.com
Email: cseltzer@sandsanderson.com
Counsel for Defendants